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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

GILBERT ARCHULETA,  
 Plaintiff,

vs.

THE HARTFORD FINANCIAL SERVICES  
 GROUP, INC.; SENTINEL INSURANCE, LLC.;  
 SENTINEL INSURANCE COMPANY, LTD., 1  
 SOURCE INSURANCE GROUP; SILVER STATE  
 HYDRAULIC SERVICES, INC.; and DOES I – V;  
 ROE CORPORATIONS I – V; ROE EMPLOYEES  
 I – V; ROE WHOLESALE I – V; and ROE  
 RETAILER I - V, inclusive,  
 Defendants.

CASE NO: 2:21-cv-01310-APG-VCF

**JOINT STATUS REPORT AND  
 STIPULATION TO STAY  
 DISCOVERY AND CONTINUE  
 DEADLINES**

The parties signing below, by and through their respective counsel of record, hereby submit this Joint Status Report, and Stipulation to stay discovery and continue the deadlines imposed by FRCP 26(f).

Plaintiff filed his Complaint on March 23, 2021 in State Court (ECF 1-2). Defendant Sentinel Insurance Company, Ltd. filed its Petition for Removal on July 9, 2021 (ECF 1). Defendant Sentinel then filed a Motion to Dismiss on July 14, 2021 (ECF 5). Defendant The Hartford Financial Services Group, Inc. also filed a Motion to Dismiss on July 14, 2021 (ECF 6). Defendant 1 Source Insurance Group filed a Motion to Dismiss on July 29, 2021 (ECF 11). Plaintiff filed a Motion for Remand on August 2, 2021 (ECF 13). Plaintiff filed a Motion to Stay

1 Pending Remand on August 27, 2021 (ECF 21). All of these noted Motions are fully briefed and  
2 awaiting decision by the Court. No Discovery Plan or Scheduling Order has yet been filed.

3  
4 The parties hereto are in agreement that a stay of all discovery is appropriate and efficient  
5 until the Court decides the pending Motion for Remand and, if jurisdiction is confirmed, the  
6 pending Motions to Dismiss. When evaluating a stay discovery while a dispositive motion is  
7 pending, the court initially considers the goal of Federal Rule of Civil Procedure 1. The guiding  
8 premise of the Rules is that the Rules “should be construed and administered to secure the just,  
9 speedy, and inexpensive determination of every action.” FED. R. CIV. P. 1. It needs no citation of  
10 authority to recognize that discovery is expensive. The Supreme Court has long mandated that  
11 trial courts should resolve civil matters fairly but without undue cost. *Brown Shoe Co. v. United*  
12 *States*, 370 U.S. 294, 306 (1962). This directive is echoed by Rule 26, which instructs the court  
13 to balance the expense of discovery against its likely benefit. See FED. R. CIV. P. 26(B)(2)(iii).  
14 Consistent with the Supreme Court’s mandate that trial courts should balance fairness and cost,  
15 the Rules do not provide for automatic or blanket stays of discovery when a potentially  
16 dispositive motion is pending. *Skellerup Indus. Ltd. v. City of Los Angeles*, 163 F.R.D. 598,  
17 600–01 (C.D. Cal. 1995). Pursuant to Federal Rule of Civil Procedure 26(c)(1), “[t]he court may,  
18 for good cause, issue an order to protect a party or person from annoyance, embarrassment,  
19 oppression, or undue burden or expense.” Whether to grant a stay is within the discretion of the  
20 court. *Munoz–Santana v. U.S. I.N.S.*, 742 F.2d 561, 562 (9th Cir. 1984).

21  
22  
23 **ATTESTATION OF CONCURRENCE IN FILING**

24 I hereby attest and certify that on, November 30, 2021, I received concurrence from  
25 Defendant 1 Source Insurance Group’s counsel, James P.C. Silvestri, Esq., to file this document  
26 with his electronic signature attached.  
27  
28

I hereby attest and certify that on, November 17, 2021, I received concurrence from Defendant Sentinel Insurance Services and The Hartford Financial Services Group, Darren T. Brenner, Esq., to file this document with his electronic signature attached.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: November 30, 2021.

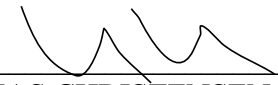
  
THOMAS CHRISTENSEN, ESQ.

The parties therefore hereby jointly request a stay of discovery, and all deadlines imposed by FRCP 26(f). The parties request that an Order be issued directing that another status report be filed with the Court 120 days from today regarding developments.

DATED THIS 30th day of November, 2021.

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And The Hartford Financial Services Group, Inc.

### ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Dated: 12-1-2021